



CJ-2021-59

TRUONG

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

IN DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

JAN - 7 2021

RICK WARREN
COURT CLERK

111

NATRAUN GLOVER,

Plaintiff,

v.

Case No. CJ-2021-59

THE COUNTY OF OKLAHOMA CITY,
OKLAHOMA COUNTY SHERIFF P.D. TAYLOR,
OKLAHOMA CITY POLICE DEPARTMENT,
NEWS 9 IN OKLAHOMA CITY,
KOCO CHANNEL FIVE,
KFOR NEWS 4,
FOX 25 NEWS, OKC,
DISTRICT ATTORNEY DAVID PRATER,
DETECTIVE MATTHEW GUY,

CJ-2021-59

Defendants.

PETITION FOR DAMAGES

COMES NOW Plaintiff, Natraun Glover proceeding in the above matter pro se and alleges and states:

1. That he is the Plaintiff herein and currently resides at 2812 S. Portland in Oklahoma City that at all times during his complaint Defendants were acting under color of state law.
2. Oklahoma County Sheriff P.D. Taylor is the Sheriff of the County jail where Plaintiff was detained and he at all times during my complaint was working under color of State law.
3. The County of Oklahoma City is a municipality and at all times during my complaint was acting under color of state law in that capacity.
4. The Oklahoma City Police department is a municipality in the State of Oklahoma and at all times during my complaint was working in that capacity.
5. News 9 is a news tabloid that is allowed to operate as a business in the State of Oklahoma and at all times during my complaint was working in that capacity.
6. KFOR News 4 is a news tabloid that is allowed to operate as a business in Oklahoma City.
7. KOCO T.V. CHANNEL 5 is a news tabloid that is allowed to operate as a business in Oklahoma City.
8. FOX 25 NEWS is a news tabloid that is allowed to operate as a business in Oklahoma City.
9. District Attorney David Prater is the duty elected District Attorney of Oklahoma County and at all

times during my complaint was working in that capacity.

10. Detective Matthew Guy is a detective with the Oklahoma City Police Department and he at all times during my complaint was working in that capacity.

CIVIL RIGHTS VIOLATIONS AND STATE AND FEDERAL VIOLATIONS
JURISDICTION OF THE COURT IS INVOKED PURSUANT TO

42 U.S.C. Section 1983, 28 U.S.C. Section 1343(3), 1st, 4th, and 14th Amendments to the United States Constitution, Art.2, section 7 of the Oklahoma Constitution, libel and slander, and malicious prosecution.

NATURE OF THE CASE

On November 30, 2016, Plaintiff was charged in the District Court of Oklahoma County with the crime of indecent or lewd acts with a child under the age of sixteen (16) in violation of the Oklahoma Statutes Title 21 section 1123. On July 12, 2016 an arrest warrant was put out by the District Court of Oklahoma demanding Plaintiff be brought in the answer said charge. At some point unknown to Plaintiff the Channel 9 news affiliate began reporting the alleged incident and numerous occasions actually accused Plaintiff of committing the rape. The criminal charge was ultimately dismissed for want of evidence and Plaintiff has been harassed, threatened and publicly humiliated that he had to defend against this outlandish charge.

FIRST CAUSE OF ACTION

1. Plaintiff was falsely accused of a rape in the District Court of Oklahoma County by Defendant David Prater.
2. That said charges were dismissed but not after Plaintiff had been falsely imprisoned and suffered near fatal heartaches, emotional distress and fear for his life.
3. That because of the blatantly false and untrue allegations, David Prater as District Attorney for Oklahoma County subjected Plaintiff to public humiliation, malicious prosecution and intentional infliction of emotional distress, falsifying documents, etc.
4. Plaintiff was falsely arrested against his will in violation of the 14th Amendment to the United States Constitution.

SECOND CAUSE OF ACTION

5. The County of Oklahoma City subjected Plaintiff to false imprisonment, false arrest, and a denial of due process of law by failing to properly train District Attorney David Prater how to run his office and to protect the liberties, rights and privileges of the citizens of the State of Oklahoma.
6. David Prater as District Attorney of Oklahoma County subjected Plaintiff a deprivation of his reputation by virtue of subjecting Plaintiff to criminal procedures on the indecent or lewd acts with a child under the age of 16 and he knew or should have known that he lacked evidence to prosecute Plaintiff but did so anyway.

THIRD CAUSE OF ACTION

7. Oklahoma Police Department detective Matthew Guy called Plaintiff into the Oklahoma City Police Department and began interrogating Plaintiff regarding the alleged rape. And upon the conclusion of that intense investigation he determined that Plaintiff couldn't have committed the rape but yet referred it to the District Attorney for criminal prosecution.

8. The wrongful actions of Det. Mathew Guy subjected Plaintiff to malicious prosecution has the case ended up being dismissed altogether.

9. Defendant Matthew Guy recklessly submitted Plaintiff to emotional distress by virtue of his playing his role in the investigation and prosecution of the rape charge. For a seven month period from late November 2015 until around June 2016, he would repeatedly call Plaintiff accusing him of sexually assaulting a child .

FOURTH CAUSE OF ACTION

10. Oklahoma County, David Prater and the District Court of Oklahoma County subjected Plaintiff to Malicious Prosecution as the patently false and unfounded rape charge was ultimately dismissed. These Defendants knew or should have known that the charges were bogus and yet turned their heads violating Plaintiff's fundamental right to Due Process of law pursuant to Art. 2, Section 7 of the Oklahoma Constitution and the 14th Amendment to the United States Constitution. Such willful practice ad regulations infringed on the rights and entitlement of 42 U.S.C. Section 1983.

11. On July 12, 2016, David Prater filed a felony arrest warrant seeking to have Plaintiff arrested on the charge of Indecent or lewd acts with a child under the age of 16. See CF-2016-9406.

12. The case lingered for three (3) years before the District Attorney decided to drop the charge.

FIFTH CAUSE OF ACTION

13. Sheriff P.D. Taylor was and is the Oklahoma County Sheriff when my arrest was made and he served in that capacity when I was booked into the Oklahoma County Jail on a complaint of Rape.

14. Sheriff Taylor actively participated in my unlawful arrest and wrongful detention in the Oklahoma County Jail in violation of my 14th Amendment right to Due Process and Equal Protection.

15. Sheriff P. D. Taylor was equally responsible for causing me intentional infliction of emotional distress for all the time Plaintiff was illegally detained in the Oklahoma County.

16. Defendant P.D. Taylor knew or reasonably should have known that he acquiesced in the wrongful detention of Plaintiff's person and that he willingly infringed on his tort law rights.

17. Defendant P.D. Taylor actively participated in the malicious prosecution of Plaintiff as he held Plaintiff in the County Jail pursuant to the unfounded criminal charge of indecent or lewd acts on a child under the age of 16.

SIXTH CAUSE OF ACTION

18. Fox 25, KOCO Channel 5, KFOR News 4 and New 9 each inaccurately slandered Plaintiff's name and reputation by falsely reporting that he'd raped child. Such careless reporting caused tens of thousands of their t.v. viewers, including Plaintiff's family and friends, to think and look upon Plaintiff harshly.

19. The actions of each subjected Plaintiff to negligent and reckless emotional distress, public humiliation, damage to reputation, and embarrassment.

20. Each used their respective news agencies to create a smear campaign against Plaintiff for no other reason than his being a black man.

RELIEF REQUESTED

Plaintiff Natraun Glover respectfully prays that this Court enters judgment in his favor and against all Defendants in excess of ten million (\$10,000,000) for intentional and negligent infliction of emotional distress, public humiliation, liable and slander, malicious prosecution, failure to properly train, denial of due process and equal protection.

Plaintiff seeks any other relief deemed just and appropriate by the court.

Plaintiff seeks a jury trial.

Respectfully submitted,

Natraun Glover

VERIFICATION

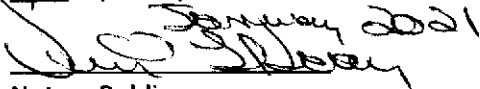
I, Natraun Glover, of sound mind, of legal age, ad upon my oath, do declare that everything written in this petition is true to the best of my knowledge and ability to remember.

Further affiant saideth not.


Affiant

Subscribed and sworn to before me this

~~Day of September 2020.~~



Notary Public

My commission expires _____

